

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

DONTAY MARKEITH WELLS  
[Enter the full name of the plaintiff in this action]

Civil Action No. \_\_\_\_\_  
(to be assigned by Clerk)

**COMPLAINT**  
**State Prisoner**

v.

SEE ATTACHMENT  
"MULTIPLE DEFENDANTS"  
"60 TOTAL"

Enter above the full name of defendant(s) in this action

RECEIVED  
USDC CLERK, COLUMBIA, SC  
2012 JAN 30 AM 11:40

**I. PREVIOUS LAWSUITS**

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes \_\_\_\_\_ No X
- B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court: \_\_\_\_\_  
(If federal court, name the district; if state court, name the county)

3. Docket Number: \_\_\_\_\_

4. Name(s) of Judge(s) to whom case was assigned: \_\_\_\_\_

5. Disposition: \_\_\_\_\_  
(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

## II. PLACE OF PRESENT CONFINEMENT

A. Name of Prison/Jail/Institution: \_\_\_\_\_

B. What are the issues that you are attempting to litigate in the above-captioned case? \_\_\_\_\_

C. (1) Is there a prisoner grievance procedure in this institution? Yes X No \_\_\_\_\_(2) Did you file a grievance concerning the claims you are raising in this matter? Yes X No \_\_\_\_\_When JAN 2010 UNTIL NOW Grievance Number (if available) MULTIPLE.. SEE ATTACHD. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes X No \_\_\_\_\_E. When was the final agency/departmental/institutional answer or determination received by you? JAN 3, 2012*If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*

F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes \_\_\_\_\_ No \_\_\_\_\_

G. If your answer is YES:

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

## III. PARTIES

*In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.*A. Name of Plaintiff: DONTAY MARKEITH WELLS Inmate No.: 30136007Address: FEDERAL CORRECTIONAL INSTITUTION PMB 1000 TALLADEGA AL 35160*In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.*B. Name of Defendant: MULTIPLE DEFENDANTS Position: VARIOUSPlace of Employment: FCI EDGEFIELD, SOUTH CAROLINA 29824

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

SEE ATTACH PAGES. MULTIPLE DEFENDANTS  
6 PAGES.

ALL DEFENDANTS ARE EMPLOYED  
AT FCI EDGEFIELD!

501 GRAY Hill RD EDGEFIELD SC 29824  
ADDITIONAL DEFENDANTS (60 TOTAL)

- 1.) ASS. WARDEN D. FALLER  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 2.) ASS WARDEN ACOSTA  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 3.) CAPTAIN C. COLLIE  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 4.) SIS CAPTAIN K. VINING  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 5.) LIEUTENANT B. FANNERTY  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 6.) LIEUTENANT CLARK  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 7.) LIEUTENANT BRYANT  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 8.) LIEUTENANT THOMPSON  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 9.) LIEUTENANT JOHNSON  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 10.) LIEUTENANT SANTIAGO  
SUED IN OFFICIAL AND PERSONAL CAPACITY

- 11.) Lieutenant Lewis  
Sued in official and personal capacity
- 12.) ACT Lieutenant / OFFICER Broadwater  
Sued in official and personal capacity
- 13.) Lieutenant Oliver  
Sued in official and personal capacity
- 14.) Lieutenant Burgess  
Sued in official capacity
- 15.) Disciplinary Hearing Officer Raymond Kelso  
Sued in official and personal capacity
- 16.) Mail Room official C. ZAMER  
Sued in official and personal capacity
- 17.) Mail Room official N. DIAI  
Sued in official and personal capacity
- 18.) Mail Room official S. HACKENBURG  
Sued in official and personal capacity
- 19.) Mail Room / Unit Manager S. LATHROP  
Sued in official and personal capacity
- 20.) Mail Room official S. Taylor  
Sued in official and personal capacity

21.) Unit Counselor J. Bryant  
Sued in official and personal capacity.

22.) Unit Manager Koger  
Sued in official and personal capacity

23.) Grievance Coordinator Mackleburg  
(7) Sued in official and personal capacity

24.) (ZNSA) Dr. Rosario  
Sued in official and personal capacity

25.) (AHSA) Dr. Guevara  
Sued in official and personal capacity

26.) Dr. Saha (MLP)  
Sued in official and personal capacity

27.) Clinical Director Dr. Blocker  
Sued in official and personal capacity

28.) Dr. Lopez  
Sued in official and personal capacity

29.) Nurse Joan Tapper  
Sued in official and personal capacity

30.) Nurse Richard Valez  
Sued in official and personal capacity

- 31.) NURSE N. CLEM  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 32.) NURSE L. RYAN  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 33.) NURSE V. SMITH  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 34.) NURSE ROGERS  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 35.) NURSE AMY BOAKE  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 36.) FOOD SERVICE ADMINISTRATOR MRS TURNER  
SUED IN OFFICIAL CAPACITY
- 37.) OFFICER J. KAPRAL  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 38.) OFFICER J. DUMAIS  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 39.) OFFICER J. FORD  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 40.) OFFICER SALMON  
SUED IN OFFICIAL AND PERSONAL CAPACITY



Pg #5

- 41.) OFFICER BILLINGS  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 42.) OFFICER REESE  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 43.) OFFICER COLEMAN  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 44.) OFFICER TUCKER  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 45.) OFFICER SIMPKENS  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 46.) OFFICER Y. GORDON  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 47.) OFFICER BARTON  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 48.) OFFICER BURKETT  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 49.) OFFICER J. HARRISOT  
SUED IN OFFICIAL AND PERSONAL CAPACITY
- 50.) OFFICER S. HOWARD  
SUED IN OFFICIAL AND PERSONAL CAPACITY

- 51.) OFFICER TOPIBERT  
SUED IN official AND PERSONAL CAPACITY
- 52.) OFFICER C. ROUSE  
SUED IN official AND PERSONAL CAPACITY
- 53.) OFFICER PEAY  
SUED IN official AND PERSONAL CAPACITY
- 54.) OFFICER J. GREEN  
SUED IN official AND PERSONAL CAPACITY
- 55.) OFFICER MUNSON  
SUED IN official AND PERSONAL CAPACITY
- 56.) OFFICER MARTINEZ  
SUED IN official AND PERSONAL CAPACITY
- 57.) OFFICER EVANS  
SUED IN official AND PERSONAL CAPACITY
- 58.) OFFICER STRICKLAND  
SUED IN official AND PERSONAL CAPACITY
- 59.) OFFICER RANDOLPH  
SUED IN official AND PERSONAL CAPACITY.
- 60.) LT HOLLET  
SUED IN official AND PERSONAL CAPACITY



## IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

SEE ATTACH

DUE TO VOLUME OF CLAIM

IN OCCORDANCE WITH RULE 8(A)

I ATTEMPTED TO BE AS BRIEF

AS POSSIBLE. (1 YEAR TORTURE LASTED)

PLEASE NOTE! AFTER EACH INCIDENT

EXIBITS ARE ATTACHED IN HOPES

OF SIMPLIFYING CLAIM! PLEASE

READ AND HELP ME PLEASE!

"I MAY BE IN DANGER"

"160 Pages TOTAL" "PLEASE HELP ME"

## COUNT ONE

Officials Violated 1<sup>st</sup> Amendment  
RETALIATION AND MAIL LAWS

## COUNT TWO

Officials Violated 5<sup>th</sup> Amendment  
DUE PROCESS

## COUNT THREE

Officials Violated THE 8<sup>th</sup> Amendment  
CRUEL AND UNUSUAL Punishment  
CORPORAL Punishment  
EXCESSIVE FORCE  
Deprivation of MEDICAL Assistance  
CONDITIONS OF Confinement Violations  
Failure to protect  
Deliberate Indifference

ALL THREE COUNTS ARE PURSUANT TO  
STATEMENT OF FACTS!  
PARAGRAPHS 1 thru 280

Any Violation Not Mentioned Here I  
would ASK the Courts Assistance PLEASE

## V. RELIEF

State briefly and exactly what you want the court to do for you.

Issue Injunctive AND Declaratory RELIEF! I AM  
HOUSE IN A SPECIAL Management Unit AS A DIRECT  
Result of RETALIATION, VIOLATION OF DUE PROCESS, OF  
falsified DISCIPLINARY REPORTS.

Award Nominal, Punitive, AND Compensatory Damages  
IN THE AMOUNT OF \$275,000 EACH Defendant OR AS  
Court see fit. FOR PAIN AND Suffering! MENTAL & Emotional!

INFORCE United States Constitution By CRIMINALLY  
CHARGING EVERY Defendant whom VIOLATED THE COLOR  
OF FEDERAL LAW. 28 USC 111, 28 USC 2, 28 USC 1151.9,  
28 USC 171, 28 USC 1900'S AND ANY Statute NOT mentioned.

EXPUNGE DISCIPLINARY RECORD AND RESTORE ALL RESTRICTIONS  
RESTRICTIONS FROM INCIDENTS!

& ONLY - AWARD ANY AND ALL DAMAGES TO MY ONLY CHILD IF  
- IN THE CASE I DON'T OUT LIVE THE JUDGEMENT  
OF MY CLAIM! NAMED AS MY BENEFICIARY IN  
CASE OF DEATH! TYEKIVA HARVIN RESIDES: 195  
APOLLO ST WEDGEFIELD SC 29168 "ONLY IF I  
DIE OR AM KILLED! AWARD DAMAGES TO MY CHILD"

I WOULD LAST ASK THE COURT TO PROTECT ME FROM  
OFFICIALS AND INSURE LIFE! HELP ME PLEASE! PLEASE

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21<sup>ST</sup> day of JANUARY, 2012.

Dontay Wells 30136007  
Signature of Plaintiff